

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

ROBERT WIRTZ JR.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:18-CV-599-JHP-FHM
)	
SHERIFF VIC REGALADO, in his)	
individual and official capacity,)	
TULSA COUNTY BOARD OF COUNTY)	
COMMISSIONERS, in their individual)	
and official capacities,)	
DR. WILLIAM COOPER, in his)	
individual and official capacity,)	
TURN KEY HEALTH CLINICS,)	
individually and officially,)	
DAVID L. MOSS CRIMINAL)	
JUSTICE CENTER UNKNOWN)	
CLASSIFICATIONS OFFICER NO. 1,)	
individually and officially,)	
ROY HERMAN, in his)	
individual and official capacity,)	
)	
Defendants.)	

DEFENDANT TULSA COUNTY SHERIFF'S OFFICE
MOTION TO FILE UNDER SEAL

COMES NOW, the Defendant, Tulsa County Sheriff, and pursuant to LCvR79.1 of the Local Rules of the United States District Court for the Northern District of Oklahoma respectfully moves the Court to enter an Order permitting Defendant to file under seal certain documents addressed in Defendant Tulsa County Sheriff's Special Report. Defendant will file its Special Report on or before May 10, 2019. Certain exhibits to the Special Report, specifically Exhibits I, J, P, Q, R, EE, FF, GG, and HH, contain sensitive and legally protected private health and medical information of the Plaintiff or are Plaintiff's medical records from his period of incarceration at the David L. Moss Criminal Justice Center. Because of the sensitive and personal nature of these

documents, Defendant requests this Court enter an Order permitting these specific Exhibits to be filed under seal.

WHEREFORE, premises considered, Defendant respectfully requests this Court enter an Order permitting Exhibits I, J, P, Q, R, EE, FF, GG, and HH, referenced in the Special Report to be filed under seal.

Respectfully submitted,

/s/ Matthew Kehoe

Matthew Kehoe, OBA #22615
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CERTIFICATE OF MAILING & ELECTRONIC NOTICE

I certify that on May 3, 2019, I caused a true and correct copy of this document to be electronically transmitted to the Clerk of Court using the ECF system for filing. Further, I certified that on the date of May 3, 2019, placed a copy of this document in the United States mail, first class postage fully pre-paid, addressed to the following:

Robert Wirtz, Jr. #198927
Davis Correctional Facility
688 East 133rd Road
Holdenville, OK 74848

/s/ Matthew Kehoe

Matthew Kehoe